

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In Re:	§	Bankruptcy Case
	§	
JOSEPH STANLEY	§	13-31189-H1-13
	§	
Debtor	§	Chapter 13

**VOLUNTARY MOTION BY DEBTOR FOR ENTRY OF AN ORDER
TO THE EMPLOYER TO PAY THE CHAPTER 13 TRUSTEE**

Stanley, Joseph, "Debtor" herein, files this Voluntary Motion by Debtor for Entry of an Order to the Employer to Pay The Chapter 13 Trustee, and would show the Court in support of the following:

1. Debtor filed for relief under Chapter 13 on 3/2/2013. The §341(a) Meeting of Creditors has not been held. The Chapter 13 Plan has not been confirmed.
2. Debtor wishes to enter a Wage Order as soon as possible to deduct the Chapter 13 Plan payment from the Debtor's wages. The Debtor feels it is in the best interest of the Plan and the Creditors to start the deduction in Month One.
3. Debtor has filed the Chapter 13 Plan with the Court and the Trustee which calls for payments of **\$450.00**. If the Chapter 13 Plan should be amended changing the payments or duration, Debtor's Attorney will provide an Amended Order to The Employer to Pay the Chapter 13 Trustee at the time of the Confirmation Hearing.
4. The Debtor requests that the Court enter an Order to the Employer, UPS of Northern California, IN, to pay David G. Peake, Trustee, Trustee.

Wherefore, the Debtor prays the Court for Entry of an Order to the Employer to pay the Chapter 13 Trustee, and for any other relief the Court deems necessary.

Respectfully submitted,

/s/ John V. Burger
John V. Burger
State Bar No. 03378650
4151 Southwest Freeway, Suite 770
Houston, Texas 77027
(713) 960-9696 telephone
(713) 961-4403 facsimile

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In Re:	§	Bankruptcy Case
	§	
JOSEPH STANLEY	§	13-31189-H1-13
	§	
Debtor	§	Chapter 13

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Voluntary Motion by Debtor for Entry of an Order to the Employer to Pay the Chapter 13 Trustee was sent to all parties in interest listed below by first class U.S. mail, postage prepaid, and/or by Court ECF electronic transmission, on or before 3/6/13.

Respectfully submitted,

/s/ John V. Burger
John V. Burger
State Bar No.03378650
4151 Southwest Freeway, Suite 770
Houston, Texas 77027
(713) 960-9696 telephone
(713) 961-4403 facsimile

Stanley, Joseph
4522 Mossygate Dr
Spring, TX 77373

David G. Peake, Trustee
9660 Hillcroft, Suite 430
Houston, TX 77096-3860

UPS of Northern California, IN
806 Seaco Ct
Deer Park, TX 77536-3176